

1 **BATHAEE DUNNE LLP**

2 Yavar Bathaee (CA 282388)

3 yavar@bathaeedunne.com

4 Andrew C. Wolinsky (CA 345965)

5 awolinsky@bathaeedunne.com

6 445 Park Avenue, 9th Floor

7 New York, NY 10022

8 (332) 322-8835

9 Brian J. Dunne (CA 275689)

10 bdunne@bathaeedunne.com

11 Edward M. Grauman (*pro hac vice*)

12 egrauman@bathaeedunne.com

13 901 S. MoPac Expressway

14 Barton Oaks Plaza I, Suite 300

15 Austin, TX 78746

16 (213) 462-2772

17 *Interim Co-Lead Counsel for the
18 Advertiser Classes*

19 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

20 Amanda F. Lawrence (*pro hac vice*)

21 alawrence@scott-scott.com

22 Patrick J. McGahan (*pro hac vice*)

23 pmcgahan@scott-scott.com

24 Michael P. Srodoski (*pro hac vice*)

25 msrodoski@scott-scott.com

26 156 South Main Street, P.O. Box 192

27 Colchester, CT 06415

28 Tel.: (860) 537-5537

1 Patrick J. Coughlin (CA 111070)

2 pcoughlin@scott-scott.com

3 Carmen A. Medici (CA 248417)

4 cmedici@scott-scott.com

5 Hal D. Cunningham (CA 243048)

6 hcunningham@scott-scott.com

7 Daniel J. Brockwell (CA 335983)

8 dbrockwell@scott-scott.com

9 600 W. Broadway, Suite 3300

10 San Diego, CA 92101

11 Tel.: (619) 233-4565

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 MAXIMILIAN KLEIN, et al.,

16 Case No. 20-cv-08570-JD

17 Plaintiffs,

18 Hon. James Donato

19 v.

20 META PLATFORMS, INC.,

21 Defendant.

22 **DECLARATION OF BRIAN J. DUNNE
IN SUPPORT OF ADVERTISER
PLAINTIFFS' MOTION TO EXCLUDE
THE EXPERT REPORT AND
TESTIMONY OF DR. CATHERINE
TUCKER**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Motion to Exclude the
7 Expert Report and Testimony of Dr. Catherine Tucker.

8 3. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of Michael A.
9 Williams, Ph.D., dated July 7, 2023.

10 4. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Joshua S. Gans,
11 dated July 7, 2023.

12 5. Attached as **Exhibit 3** is a true and correct copy of the Advertiser Class Rebuttal Report
13 of Catherine Tucker, Ph.D., dated August 4, 2023.

14 6. Attached as **Exhibit 4** is a true and correct copy of the Reply Report of Joshua S. Gans,
15 dated September 1, 2023.

16 7. Attached as **Exhibit 5** is a true and correct copy of the Expert Reply Report of Michael
17 A. Williams, Ph.D., dated September 15, 2023.

18 8. Attached as **Exhibit 6** is a true and correct copy of excerpts from deposition of Catherine
19 Tucker, Ph.D., dated September 26, 2023.

20 9. Attached as **Exhibit 7** is a true and correct copy of excerpts from the deposition of Alex
21 Schultz, dated March 31, 2023.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6,
23 2023, in Austin, Texas.

24 /s/ Brian J. Dunne

25 Brian J. Dunne

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